



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-2900 FAX (603) 271-2456



May 24, 2004

CERTIFIED MAIL
7000 1670 0000 0585 8964
RETURN RECEIPT REQUESTED

LETTER OF DEFICIENCY
No. WMD 04-07

Celestica
9 Northeastern Boulevard
Salem, NH 03079

Attn: Mr. Norman Boisse, Quality Systems Manager

Re: Celestica
Salem, New Hampshire
EPA ID # NHD510172174

Dear Mr. Boisse:

On March 23, 2004, the Department of Environmental Services, Waste Management Division ("DES") conducted an inspection of Celestica in Salem, NH. The purpose of the inspection was to determine Celestica's compliance status relative to RSA Ch. 147-A and the New Hampshire Hazardous Waste Rules, Env-Wm 100-1100.

As a result of the inspection, the following deficiencies in your hazardous waste management program were documented:

1 Env-Wm 504.02(d) and Env-Wm 504.02(b)(7)- Generator Notification

At the time of inspection, according to DES notification records, Celestica had notified as a Full Quantity Generator (>1000 kilograms/ month). However, a review of waste disposal records indicates that Celestica's generator status may be that of a Full Quantity Generator (100 - 1000 kilograms/ month).

Env-Wm 504.02(d) requires that a generator shall notify DES verbally or in writing of any changes to the information required in Env-Wm 504.02(b), including generator status, within 30 days of the effective date of the change.

DES requests that Celestica review its facility hazardous waste generation rates in order to determine its proper generator status; and if necessary, complete and submit a subsequent notification form that accurately reflects the change in generator status.

2. Env-Wm 507.02(a)- Storage Time Requirements

At the time of the inspection, one (1) 55-gallon container marked as "Spent Flux and Alcohol Thinner Containing Lead" and stored in the Core D hazardous waste storage unit was marked with an accumulation date of 10/30/03, indicating 144 days of storage time.

Env-Wm 507.02(a) requires that hazardous wastes are shipped off-site within 90-days of the date when accumulation of the waste first began.

DES requests that Celestica ensure that all hazardous wastes generated on-site are shipped off-site within a period of ninety (90) days or less, unless the hazardous waste is managed under the Satellite Storage Provision of Env-Wm 509.03.

To the extent that Celestica is adversely affected by the application of Env-Wm 507.02(a) and generates hazardous waste at the rate of 100-1000 kilograms/month, Celestica may apply for a waiver from DES, as provided in Env-Wm 212, allowing the "Spent Flux and Alcohol Thinner Containing lead" to be accumulated for up to 180-days without a permit, as specified in 40 CFR 262.34(d). Until a waiver to this requirement is granted, Celestica needs to comply with the storage time requirement of Env-Wm 507.02(a).

DES acknowledges the receipt of a Request for Waiver application on April 21, 2004 and is in the process of reviewing the request for consideration as a waiver.

3. Env-Wm 507.03(a)(1)a.- Beginning Accumulation Date

At the time of the inspection, DES personnel observed eleven (11) containers of hazardous waste stored in the Core D hazardous waste storage unit and one (1) container of hazardous waste located in the Core C hazardous waste storage area that were not marked with beginning accumulation dates. See the attached Hazardous Waste Container Inventory ("Inventory").

Env-Wm 507.03(a)(1)a. requires that all containers used for the storage of hazardous waste be marked with the beginning accumulation date at the time they are first used to store hazardous wastes.

DES requests that Celestica properly mark all containers of hazardous waste with the beginning accumulation date at the time they are first used to store hazardous waste.

4. Env-Wm 507.03(a)(1)b., c, & d.- Labeling Requirements

At the time of the inspection, three (3) containers of hazardous waste stored in the Core D hazardous waste storage unit were not marked with the words "hazardous waste", words that identify the contents, and the EPA or state waste number (see the attached Inventory). In

addition, seven (7) containers of hazardous waste, stored in the Core D hazardous waste storage unit, were not marked with the EPA or state waste number.

Env-Wm 507.03(a)(1)b., c., and d. require that all containers used for the storage of hazardous waste be marked with the words "hazardous waste", words that identify the contents, and the EPA or state waste number at the time they are first used to store hazardous wastes.

DES requests that Celestica properly mark all containers of hazardous waste with the words "hazardous waste", words that identify the contents, and the EPA or state waste number at the time they are first used to store waste.

5. Env-Wm 509.02(a)(2)- Personnel Training

Training records provided to DES at the time of inspection failed to document a training program which includes a list of hazardous waste job titles, job descriptions, descriptions of introductory and continuing training to be provided for each position, and names of employees filling each position.

Env-Wm 509.02(a)(2), which references 40 CFR 265.16, Personnel Training, requires full quantity generators to maintain a personnel training program. This includes, but is not limited to, ensuring that specific documents and records related to personnel training are maintained at the facility.

DES requests that Celestica maintain a complete written personnel training program which documents hazardous waste job titles, job descriptions, names of employees filling each position, and a description of the type and amount of introductory and continuing training to be given to each person filling a position with hazardous waste management duties (refer to the enclosed FQG Module). Please submit a copy of this personnel training program to DES.

6. Env-Wm 509.02(a)(5)- Contingency Plan

A review of Celestica's contingency plan revealed deficiencies regarding the following:

- (a) Copies of the plan have not been submitted to the local authorities (police, fire, hospitals, contractors, and state and local emergency response teams);
- (b) The designation of one person as the primary emergency coordinator;
- (c) The emergency coordinator's home addresses;
- (d) An evacuation plan that describes the signals used to begin an evacuation, evacuation routes, and alternate evacuation routes;

- (e) Provisions for the emergency coordinator to activate internal facility alarms;
- (f) Instructions to notify DES if human health or the environment is threatened and to include in the notification the items listed in 40 CFR 265.56(d)(2)(i)-(vi);

Procedures for monitoring equipment if there is a work stoppage;

Procedures for providing that all equipment has been cleaned and is fit for use before the resumption of operations;

- (i) Instructions to notify local authorities that the facility is in compliance with 40 CFR 265.56(h)(1) & (2) before resumption of activities; and
- (j) Instructions to submit a written report to DES within 15 days after an incident and to include in the report the items listed in 40 CFR 265.56(j).

Env-Wm 509.02(a)(5), which references 40 CFR 265, Subpart D, requires full quantity generators to maintain a complete contingency plan at the site.

DES requests that Celestica revise and update its contingency plan to correct any deficiencies as identified in the enclosed Contingency Plan Module.

7 Env-Wm 509.03(g)- Satellite Accumulation

At the time of the inspection, one (1) 1-gallon satellite storage container of hazardous waste "Lead Contaminated Debris" observed in Core C and one (1) 5-gallon container of hazardous waste "Lead Contaminated Debris" observed in Core D were not marked with the words "hazardous waste". See the attached Inventory.

Env-Wm 509.03(g) requires that all satellite storage containers used for the storage of hazardous waste be marked with the following information at the time they are first used to store wastes: the words "hazardous waste" and with words that identify the contents of the container(s).

DES requests that Celestica properly mark satellite containers of hazardous waste with the words "hazardous waste" and words that identify the contents of the container.

DES believes the cited deficiencies can be corrected and a report describing the corrective measures taken by Celestica can be submitted within thirty (30) days of receipt of this letter. Supporting documentation that describes the measures taken to achieve compliance should be included with the report.

In the event compliance is not achieved within this period, DES may take further action against Celestica including issuing an order requiring that the deficiency be corrected, initiating an administrative fine proceeding, and/or referring the matter to the New Hampshire Department of Justice for imposition of civil penalties. In addition, DES personnel may re-inspect your facility at a later date to determine whether the facility has come into, and is maintaining, full compliance with the applicable rules. Fines may be pursued for any or all violations observed during this or subsequent inspections of the facility.

The written report as requested above should be addressed as follows

Kenneth W. Marschner, Administrator
DES/WMD
P.O. Box 95
Concord, New Hampshire 03302-0095

Enclosed you will find a copy of the completed Hazardous Waste Generator Inspection Report which documents the compliance status of your facility at the time of the inspection. This report may also be of value to you for use in determining future compliance with the New Hampshire Hazardous Waste Rules.

The State of New Hampshire Hazardous Waste Rules, as well as much other useful information, can be obtained from DES's website at <http://www.des.state.nh.us/hwcs/>, or by contacting the Public Information Center at (603) 271-2975.

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental quality goals. We strive to ensure that pollution prevention options are considered first, followed by recycling, treatment and disposal. I am requesting that the DES's Pollution Prevention Coordinator, Stephanie D'Agostino, contact you to discuss possibilities for waste minimization or source reduction at your facility. In the meantime, if you have immediate questions about pollution prevention, please feel free to contact her at 271-6398.

As a service to New Hampshire's hazardous waste generators, we maintain a Hazardous Waste Assistance Hotline which is available for you to contact our knowledgeable staff of hazardous waste inspectors. Our hazardous waste staff is available to answer your questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets of specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policy or regulatory interpretation letters that may benefit your operation, and networks with other state or federal agencies to answer your questions on a national level. The Hotline is available Monday through Friday, 8:00 AM to 4:00 PM at (1-866) HAZ-WAST (in-state only) or (603) 271-2942.

Celestica

Letter of Deficiency No. WMD 04-07

Page 6 of 6

DES

Should you have any questions regarding this letter, please contact the lead inspector, Robert Bishop, or John J. Duclos, Supervisor of the Hazardous Waste Compliance Section at 271-2942. Specific questions regarding water related issues may be directed to Mary Jane Meier of DES's Water Division at 271-5553, and for air related issues, please contact Pam Monroe of DES's Air Resources Division at 271-1370. Thank you for your cooperation.

Sincerely

A handwritten signature in black ink, which appears to read "Kenneth W. Marschner", is written over the word "COPY". The word "COPY" is printed in a large, bold, sans-serif font.

Kenneth W. Marschner, Administrator
Waste Management Programs
Waste Management Division

DB/RCRA/LOD/Archives

Anthony P. Giunta, P.G., Director, WMD

Gretchen Hamel, Administrator, DES Legal Unit

E-mail: JJD/SD/MM/PM